

Message

From: Keller, Lynn [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=08038B86D66A47D3AACA8BEE1A63A5A7-LKELLER]
Sent: 3/30/2018 7:19:50 PM
To: Fennessy, Christopher [christopher.fennessy@Rocket.com]
Subject: RE: [EXTERNAL] FW: Aerojet Rocketdyne consent decree language

Ok; I'll pass that along. I have a meeting with Larry scheduled Tues before I head to LA.

Lynn M. Keller, EL, PMP
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From: Fennessy, Christopher [mailto:christopher.fennessy@Rocket.com]
Sent: Friday, March 30, 2018 12:05 PM
To: Keller, Lynn <Keller.Lynn@epa.gov>
Subject: RE: [EXTERNAL] FW: Aerojet Rocketdyne consent decree language

We believe it is covered by stating

"Aerojet General Corp. Superfund Site Enforcement Orders" shall mean...or any Memorandum of Understanding (MOU) between EPA and the State of California to oversee implementation of, ...".

This should cover Area 40 whether EPA issues a UAO as you point out or if EPA and State sign and MOU.

Christopher M. Fennessy, P.E.
Aerojet Rocketdyne, Inc.
Engineering Manager, Site Remediation
11260 Pyrites Way, Suite 125
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Ph: 916-355-3341
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Email: Christopher.Fennessy@Rocket.com

From: Keller, Lynn [mailto:Keller.Lynn@epa.gov]
Sent: Friday, March 30, 2018 11:36 AM
To: Fennessy, Christopher
Subject: RE: [EXTERNAL] FW: Aerojet Rocketdyne consent decree language

Hi, Chris.

I'll talk with Larry about this, but to me it looks like the language in the CD regarding Area 40 would still require a UAO. The goal was to get language in the CD that would cover Area 40 oversight costs, and negate the need to complete a separate UAO for Area 40 to tell Aerojet to implement the State's RAP:

To address the fact that, for any UAO where DTSC is taking the lead, EPA will still incur costs of overseeing and coordinating with DTSC, we propose:

“Aerojet General Corp. Superfund Site Enforcement Orders” shall mean the Western Groundwater UAO, the PGOU UAOs, BOU UAO [if in effect at time of lodging: OU-10 UAO], and such additional enforcement orders to implement, or any Memorandum of Understanding (MOU) between EPA and the State of California to oversee implementation of, a remedy selection decision....

Have a nice Easter weekend, Chris,
Lynn

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From: Fennessy, Christopher [mailto:christopher.fennessy@Rocket.com]
Sent: Friday, March 30, 2018 10:32 AM
To: Keller, Lynn <Keller.Lynn@epa.gov>
Subject: RE: [EXTERNAL] FW: Aerojet Rocketdyne consent decree language

Actually, this was from DOJ. We do not agree with all of this language. The language for Area 40 sounds fine, if you agree.

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From: Fennessy, Christopher
Sent: Friday, March 30, 2018 10:26 AM
To: Keller, Lynn (Keller.Lynn@epa.gov)
Subject: FW: [EXTERNAL] FW: Aerojet Rocketdyne consent decree language

Hi Lynn – Please see attached proposed language incorporating Area 40 into the consent decree. This was sent to Larry Bradfish earlier this week. Chris

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From: Feng, Wendy [<mailto:wfeng@cov.com>]
Sent: Tuesday, March 27, 2018 9:05 AM
To: Fennessy, Christopher
Subject: [EXTERNAL] FW: Aerojet Rocketdyne consent decree language

From: Gillespie, Amy (ENRD) [<mailto:Amy.Gillespie@usdoj.gov>]
Sent: Monday, March 26, 2018 2:18 PM
To: Feng, Wendy <wfeng@cov.com>; Larry Bradfish (bradfish.larry@epa.gov) <bradfish.larry@epa.gov>
Cc: Hobel, Lawrence <Lhobel@cov.com>; William Hvidsten <William.Hvidsten@rocket.com>
Subject: Aerojet Rocketdyne consent decree language

Counsel:

As we discussed, I am attaching some proposed edits to the consent decree to address some of the concerns Aerojet raised on our February 28, 2018 conference call.

We look forward to talking with you about these proposed changes and any other questions you may have on Tuesday, April 3.

Amy Gillespie
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